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RECEIVED

February 6, 2006

FEB - 6 2006

Federal Communications Commission  
Office of Secretary

**BY HAND DELIVERY**

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: EB Docket No. 06-36 / EB-06-TC-060: Certification of CPNI Filing  
February 3, 2006

Dear Ms. Dortch:

Talk America Inc., through counsel, respectfully submits the enclosed Customer Proprietary Network Information Certification for filing in EB Docket No. 06-36 and EB-06-TC-060. If you have any questions regarding this filing, please contact the undersigned at (202) 887-1234.

Sincerely,

*Jennifer M. Kashatus*

Jennifer M. Kashatus

Enclosure

cc: Byron McCoy, Telecommunications Consumers Division,  
Enforcement Bureau, FCC

No. of Copies rec'd \_\_\_\_\_  
List A B C D E \_\_\_\_\_

### 2005 Customer Proprietary Network Information Certification

I, Aloysius T. Lawn IV, EVP-General Counsel and Secretary of Talk America Inc. have firsthand knowledge of the procedures that Talk America Inc. has implemented to comply with the Federal Communications Commission's rules pertaining to safeguarding customer proprietary network information ("CPNI"). I certify that Talk America Inc. has established procedures that are adequate to comply with the Commission's CPNI rules set forth in section 64.2001 et seq. I relied on Attachment A in making this certification.

Aloysius T. Lawn IV  
Signature

EVP – General Counsel and Secretary  
Title

2/3/06  
Date

**2005 Customer Proprietary Network Information Certification  
Attachment A**

Talk America Inc. has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules pertaining to the use, disclosure, and access to customer proprietary network information ("CPNI") set forth in section 64.2001 et seq. Talk America Inc. has trained its personnel in the appropriate use of CPNI. Talk America Inc.'s handbook summarizes the appropriate use of CPNI and the disciplinary process in place for failure to use CPNI in accordance with Talk America Inc.'s policy.

In accordance with Talk America Inc.'s policy, Talk America Inc. does not use CPNI for any marketing purpose other than to market services to customers within the same category of service to which they already subscribe. For example, Talk America Inc. may contact the customer regarding extending the length of the customer's contract with Talk America Inc. Talk America Inc. also may use CPNI as required to render services and to bill for such services. Talk America Inc. does not share CPNI with affiliates or third parties.